

February 22, 2002

Mr. Larry Mast
Jayco, Inc.
P.O. Box 460
Middlebury, Indiana 46540-0460

Re: 039-15547-00265
Second Administrative Amendment to
Part 70 T039-5080-00265

Dear Mr. Mast:

Jayco, Inc. was issued a permit on June 30, 1999 for a stationary recreational vehicle manufacturing source. A letter requesting a change in an Emission Source number was received on February 5, 2002. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The recreational vehicle assembly line, known as EU L-51 was incorporated into the Part 70 permit 039-5080-00265 by the First Administrative Amendment 039-12165-00265. First Minor Permit Modification 039-12471-00265 then corrected the permit placement of this emission source from Section D.5 to a new added Section D.6. Jayco, Inc. has requested the emission source number EU L-51 be changed to EU L-21. This change does not effect emissions but corrects the internal records of Jayco, Inc. and keeps it consistent with the operating permit. The following changes were made to the Part 70 permit:

Page 5, Table of Contents was changed to reflect the new emission source number from EU L-51 to EU L-21. (changes are bolded and stricken out for emphasis).

D.6 FACILITY CONDITIONS - Assembly Line, EU ~~L-51~~ L-21

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.6.3 HAPs Limitations [326 IAC 2-4.1-1]
- D.6.4 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirement

- D.6.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
- D.6.6 VOC and HAPs Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.6.7 Record Keeping Requirements
- D.6.8 Reporting Requirements

Certification Form

Emergency/Deviation Occurrence Report

Monthly Report Form

Quarterly Report Form

Page 7, Section A.2, Emission Units and Pollution Control Equipment Summary is revised to change the emission source number of the recreational vehicle assembly line. (Changes are bolded and stricken out for emphasis).

- (q) One (1) recreational vehicle assembly line, known as ~~EU L-51~~ **EU L-21**, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

Page 45, Facility Operation Conditions, had all references to EU L-51 changed to EU L-21. (Changes are bolded and stricken out for emphasis).

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (q) One (1) recreational vehicle assembly line, known as ~~EU L-51~~ **EU L-21**, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the recreational vehicle assembly line, ~~EU L-51~~ **EU L-21**, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the recreational vehicle assembly line, ~~EU L-51~~ **EU L-21**, will make the line subject to 326 IAC 8-1-6.

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

To avoid the applicability of 326 IAC 8-2-9, the volatile organic compounds (VOC) delivered to the applicators for coating metal parts in assembly line, ~~EU L-51~~ **EU L-21**, shall be limited to less than fifteen (15) pounds per day.

D.6.3 HAPs Limitations [326 IAC 2-4.1-1]

- (a) The worst case single HAP delivered to the applicators in recreational vehicle assembly line, ~~EU L-51~~ **EU L-21**, shall be less than ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in recreational vehicle assembly line, ~~EU L-51~~ **EU L-21**, shall be less than a total of twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.6.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the assembly line, ~~EU L-51~~ **EU L-21**, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per

hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Pages 55 through 56, Part 70 Quarterly Report Forms, were corrected to change references of emission source number EU L-51 to EU L-21. New copies are provided in the attached replacement pages.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Gary Freeman, at (800) 451-6027, press 0 and ask for Gary Freeman or extension 3-5334, or dial (317) 233-5334.

Sincerely,
Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments :

PD/gkf

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Data Section - Karen Nowak
IDEM Northern Regional Office
Permit Review Section 1 - Gary Freeman
Air Programs - Chet Bohannon

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR QUALITY**

**Jayco, Inc.
903 South Main Street
Middlebury, Indiana 46540**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-5080-00265	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 30, 1999 Expiration Date: June 30, 2004

First Minor Source Modification 039-11383-00265, issued December 3, 1999
Second Minor Source Modification 039-12099-00265, issued May 11, 2000
First Administrative Amendment 039-12165-00265, issued May 11, 2000
First Minor Permit Modification 039-12471-00265, issued August 1, 2000
First Reopening 039-13245, issued January 29, 2002

Second Administrative Amendment : 039-15547-00265	Pages Affected: 5, 7, 45, 55, 56, 57 and 58
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 5, 2002

D.6 FACILITY CONDITIONS - Assembly Line, EU L-21

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]
- D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.6.3 HAPs Limitations [326 IAC 2-4.1-1]
- D.6.4 Particulate Matter (PM) [326 IAC 6-3-2]

Compliance Determination Requirement

- D.6.5 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)
- D.6.6 VOC and HAPs Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.6.7 Record Keeping Requirements
- D.6.8 Reporting Requirements

Certification Form

Emergency/Deviation Occurrence Report

Monthly Report Form

Quarterly Report Form

Quarterly Compliance Monitoring Form

- (h) One (1) lamination operation, known as lamination, installed in 1973, exhausted internally, maximum capacity to support assembly line production.
- (i) One (1) metal and wood spray booth, known as EU SB-2, installed in 1973, exhausted to vents P4-1 and P4-2, using air assisted, airless, and conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (j) One (1) wood component spray booth, known as EU SB-3, installed in 1973, exhausted to vent P4-3, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (k) One (1) wood component dip tank, known as EU DB-4, installed in 1973, exhausted to vent P4-4, maximum capacity to support assembly line production.
- (l) One (1) adhesive on wood application area, known as EU SB-5, installed in 1976, exhausted to vent P8-1, using air atomized spray equipment, maximum capacity to support assembly line production.
- (m) One (1) recreation vehicle assembly line, known as EU L-6, installed in 1987, exhausted internally, includes adhesive application, solvent wiping, caulking, and touch-up paint operations, capacity: 4 RVs per hour.
- (n) One (1) wood component spray booth, known as EU SB-1, installed in 1992, exhausted to vent P16-1, using conventional spray equipment, equipped with dry filter control, maximum capacity to support assembly line production.
- (o) One (1) repair spray booth known as SB-6, to be installed in 1998, exhausted to vent P10-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (p) One (1) repair spray booth, known as SB-7, to be installed in 1998, exhausted to P41-1, equipped with dry filter control, maximum capacity to support assembly line production.
- (q) One (1) recreational vehicle assembly line, known as EU L-21, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.
- (r) One (1) recreational vehicle assembly line known as the Small Eagle Travel trailers production line L-2, which includes adhesive, solvent wiping, caulking and touch-up paint operations, with a capacity of 4 RVs per hour. The coatings are applied through spray system, brush, wiping and caulking gun. The line exhausts internally.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (d) Any of the following structural steel and bridge fabrication activities:

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

- (q) One (1) recreational vehicle assembly line, known as EU L-21, to be installed in 2000, exhausting inside the building, consisting of: adhesive, solvent wiping, caulking and touch-up paint operations, capacity: 4 recreational vehicles per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The VOC delivered to the applicators of the recreational vehicle assembly line, EU L-21, shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Any change or modification which may increase actual VOC usage to twenty-five (25) tons per year or more from the recreational vehicle assembly line, EU L-21, will make the line subject to 326 IAC 8-1-6.

D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

To avoid the applicability of 326 IAC 8-2-9, the volatile organic compounds (VOC) delivered to the applicators for coating metal parts in assembly line, EU L-21, shall be limited to less than fifteen (15) pounds per day.

D.6.3 HAPs Limitations [326 IAC 2-4.1-1]

- (a) The worst case single HAP delivered to the applicators in recreational vehicle assembly line, EU L-21, shall be less than ten (10) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in recreational vehicle assembly line, EU L-21, shall be less than a total of twenty-five (25) tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-4.1-1 do not apply.

D.6.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the assembly line, EU L-21, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-21
Parameter: Volatile Organic Compounds
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by:

Title / Position:

Signature:

Date:

Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-21
Parameter: Single HAP Delivered to the Applicators
Limit: Less than Ten (10) tons per twelve (12) consecutive month period

YEAR: _____

Month	Single HAP (tons)	Single HAP (tons)	Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by:

Title / Position:

Signature:

Date:

Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-21
Parameter: Combination of HAPs Delivered to the Applicators
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

YEAR: _____

Month	Combination of HAPs (tons)	Combination of HAPs (tons)	Combination of HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by:

Title / Position:

Signature:

Date:

Phone:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Monthly Report

Source Name: Jayco, Inc.
Source Address: 903 South Main Street, Middlebury, Indiana 46540
Mailing Address: P. O. Box 260, Middlebury, Indiana 46540
Part 70 Permit No.: T 039-5080-00265
Facility: EU L-21
Parameter: Volatile Organic Compounds
Limit: Less than 15 pounds per day

Month: _____ Year: _____

Day	EU L-21	Day	EU L-21
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		no. of deviations	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by:
Title/Position:
Signature:
Date:
Phone: